

SABRINA P. SHROFF
ATTORNEY AT LAW

80 BROAD STREET, 19TH FLOOR
NEW YORK, NEW YORK 10007
TEL: (646) 763-1490

February 3, 2023

Honorable Brian M. Cogan
United States District Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

Re: United States v. Colinford Mattis, 20 Cr. 203 (BMC)

Dear Judge Cogan,

With the consent of pretrial, to whom the government defers, we write to request a limited modification of Mr. Mattis's bail conditions (home confinement) to allow him to travel to two nearby locations in Brooklyn for the purpose of facilitating the transition of his children's and pet's care before his surrender.

First, we request that Mr. Mattis be permitted to travel to the home of his sister, Doreen Crowe, once each week on Sundays (or a different day, as needed, subject to pretrial's approval) beginning next Sunday, February 12, 2023, until Mr. Mattis's surrender date, so that Mr. Mattis can assist Ms. Crowe in preparing her home to be ready for the care of his children.¹ In particular, Ms. Crowe requires Mr. Mattis's assistance with various tasks such as assembling, moving, and fixing furniture, ensuring that the children have everything they will need in their new home, preparing her home to comply with foster agency requirements and inspections, and otherwise facilitating the smooth transition of their care. Mr. Mattis would, each week, provide pretrial with the specific requested day (which, as noted, is anticipated to be Sunday in general) and time period of the home visit to allow pretrial to approve and monitor this request.

Second, we request that Mr. Mattis be permitted to take his dog to a Brooklyn-based veterinarian (the Franklin Avenue Animal Hospital, or an affiliate), and any required follow-up appointment, before the dog is transitioned to the care of a family member while Mr. Mattis is in prison. Mr. Mattis will provide the date and time of such appointment(s) to pretrial once scheduled.

We thank the Court for its consideration of these requests.

Respectfully submitted,

/s/ Adam Z. Margulies
Sabrina P. Shroff
Adam Z. Margulies
Counsel to Colin Mattis

cc: Pretrial Officer Ezenyilimba
Ian Richardson, Esq.

¹ Ms. Crowe's address, which is about 15 minutes away (walking) from Mr. Mattis's home, is known to pretrial.